# UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF TEXAS AMARILLO DIVISION

FREEDOM COALITION OF DOCTORS FOR CHOICE,

Plaintiff,

v.

CENTERS FOR DISEASE CONTROL AND PREVENTION, AND DEPARTMENT OF HEALTH & HUMAN SERVICES,

Defendants.

Civil Action No. 2:23-cv-00102-Z

### UNOPPOSED MOTION TO PROCEED WITHOUT LOCAL COUNSEL

Plaintiff seeks leave of the Court to proceed without local counsel as to their counsels

Aaron Siri and Elizabeth A. Brehm. Plaintiff provides the following good cause to do so:

Plaintiff's lead counsel, associated attorney John Sullivan, filed a Motion to Proceed Without Local Counsel which was granted on June 26, 2023. Further, the undersigned's cocounsel, attorney Christopher Wiest filed a pro hac vice application which was granted on June 26, 2023.

Plaintiff is represented by a team of attorneys from different law firms that now include the undersigned. At all times, Plaintiff's representation is subject to a joint representation agreement. Plaintiff thus requests that the Court grant this motion to proceed without local counsel for attorneys Aaron Siri and Elizabeth A. Brehm, who will work with attorneys John Sullivan and Chris Wiest on this case.

Counsel for Plaintiff met and conferred with counsel for Defendants on December 13, 2023, and Defendants represented that they do not oppose this Motion.

### **CONCLUSION**

For the foregoing reasons, Plaintiff requests that the Court grant this Motion to Proceed Without Local Counsel for attorneys Aaron Siri and Elizabeth A. Brehm.

December 13, 2023

/s/ Aaron Siri

Aaron Siri\*

New York Bar Number: 4321790

Siri & Glimstad LLP

745 Fifth Avenue, Suite 500

New York, New York 10151

Tel: (212) 532-1091

aaron@sirillp.com

/s/ Elizabeth A. Brehm

Elizabeth A. Brehm\*

New York Bar Number: 4660353

(\*pro hac vice application pending)

Siri & Glimstad LLP

745 Fifth Avenue, Suite 500

New York, New York 10151

Tel: (212) 532-1091

Crestview Hills, KY 41017

Tel: (513) 257-1895 Fax: (859) 495-0803 chris@cwiestlaw.com

ebrehm@sirillp.com Attorneys for Plaintiff

Respectfully submitted.

/s/ John C. Sullivan

John C. Sullivan

S|L LAW PLLC

Texas Bar Number: 24083920

610 Uptown Boulevard, Suite 2000

Cedar Hill, Texas 75104

Tel: (469) 523–1351

Fax: (469) 613-0891

john.sullivan@the-sl-lawfirm.com

Christopher Wiest (pro hac vice)

Chris Wiest, Atty at Law, PLLC

25 Town Center Boulevard, Suite 104

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#### CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2023, a true and correct copy of this Motion was served by CM/ECF on all counsel or parties of record.

December 13, 2023

/s/ Aaron Siri
Aaron Siri
N.Y. Bar No. 4321790
Siri & Glimstad LLP
745 Fifth Avenue, Suite 500
New York, New York 10151
Tel: (212) 532-1091
aaron@sirillp.com

## **CERTIFICATE OF CONFERENCE**

Plaintiff's counsel, John Sullivan, conferred with Defendants' counsel, Sarah Delaney, on December 13, 2023, and Defendants are not opposed to this Motion.

December 13, 2023 /s/ Aaron Siri

Aaron Siri N.Y. Bar No. 4321790 Siri & Glimstad LLP 745 Fifth Avenue, Suite 500 New York, New York 10151

Tel: (212) 532-1091 aaron@sirillp.com